

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,
AMAZON.COM SERVICES LLC, a Delaware
limited liability company, and AMAZON
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as
“REKK,” and the following individuals: Oscar
Pineda, Janiyah Alford, Noah Page, Skylar
Robinson, William Walsh, Luke Colvin,
Alejandro Taveras, Andrew Ling, Brandon
Sukhram, Charalampos Gkatzoulas, Cosmin
Sopca, Dylan Hinz, Eric Niezabytowski, Graham
Ferguson, Ivona Brazovskaja, James Garofalo,
Jenny Tran, Johanes Kessel, Jorge Correa, Josh
Davis, Karcper Niepogoda, Olaf Booij, Ryan
Bates, Sai Charan Beeravelli, Simone Antonio
Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT
INJUNCTION AS TO
DEFENDANT SIMONE
ANTONIO FIGURA AND
~~PROPOSED~~ ORDER

NOTED FOR CONSIDERATION:
February 20, 2024

Without Oral Argument

STIPULATION

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,
Inc. (together, “Amazon”), and Defendant Simone Antonio Figura (“Figura”) and (collectively
“Settling Parties”), by and through Amazon’s respective counsel of record and by Figura’s pro-se

1 representation, notify the Court that the Settling Parties have reached a settlement of all claims
2 between them in this matter. Pursuant to the terms of that settlement, the Settling Parties
3 stipulate and agree to entry of the permanent injunction below.

4 //

5 //

6 //

7 //

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

DATED this 20th day of February, 2024.

Davis Wright Tremaine LLP
Attorneys for Plaintiffs

Defendant

By s/Melina Garcia
Bonnie MacNaughton, WSBA #36110
Tim Cunningham, WSBA #50224
Melina Garcia, WSBA #58036
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Phone: 206-622-3150
Fax: 206-757-7700
Email: bonniemacnaughton@dwt.com
timcunningham@dwt.com
melinagarcia@dwt.com

DocuSigned by:
Simone Figura
B6A517B964A2467
By s/
Simone Antonio Figura
Phone: +37063234280
Email: sim.figura@gmail.com

PERMANENT INJUNCTION

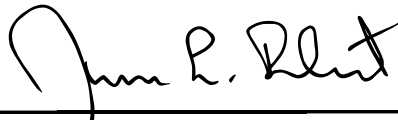
Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that Defendant Simone Antonio Figura, and his respective employees, agents, successors and assigns, and all others in active concert or participation with him, are permanently enjoined and restrained from:

1. Accessing and using, whether directly or indirectly via a third party, intermediary, or proxy, Amazon.com, or any other Amazon online store around the world;
2. Exploiting or abusing Amazon's ordering or return services;
3. Making false statements or misrepresentations to Amazon;
4. Engaging in any activity that defrauds Amazon into paying money or providing replacement products for illegitimate returns;
5. Engaging in any scheme or malicious activity that interacts with Amazon; and
6. Knowingly and materially assisting or engaging any other person or business entity in engaging in or performing any of the activities listed above.

1 The Court shall retain continuing jurisdiction over this matter for the limited purposes of
2 enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent
3 Injunction.

4 IT IS SO ORDERED.

5 DATED: February 20, 2024

6
7
8 

9 The Honorable James L. Robart
10 UNITED STATES SENIOR DISTRICT JUDGE
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27